

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DORIS ORTIZ-RIVERA,

*Plaintiff,*

-against-

Case No.: 1:24-cv-09919(JGK)

THE TRUSTEES OF COLUMBIA UNIVERSITY  
IN THE CITY OF NEW YORK and COLUMBIA  
UNIVERSITY IRVING MEDICAL CENTER

*Defendants.*  
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**JOINT RULE 26(f)(3) DISCOVERY PLAN**

*Scheduling Order*

Pursuant to Rule 26(f)(3) of the Federal Rules of Civil Procedure, Plaintiff Doris Ortiz-Rivera and Defendant, The Trustees of Columbia University in the City of New York respectfully provide their joint discovery plan as follows:

**A. Any changes to be made to Rule 26(a) Initial Disclosures:**

Pursuant to the Second Amended Standing Administrative Order (Docket No. 13), the Pilot Discovery Protocols for Counseled Employment Cases “supersede the parties’ obligations under Fed. R. Civ. P. 26(a)(1).” The parties have exchanged documents and information in accordance with the pilot protocols and, therefore, will not exchange Rule 26(a)(1) disclosures.

**B. Discovery: subjects, date for completion, conducted in phases, limited or focused on particular issues:** The parties propose the following:

1. Deadline for the completion of all fact discovery: March 2, 2026.
2. The parties further propose that any expert discovery related to damages, including any forensic examinations, should be conducted after the Court has ruled on any motion for summary judgment.
3. To the extent not previously disclosed, the parties will produce documents and information responsive to the Discovery Protocols for Employment Cases Alleging Adverse Action (“Discovery Protocols”) on or before July 30, 2025. The parties

will make good faith efforts to produce all responsive ESI on or before September 30, 2025.

4. The parties will serve initial document requests, including ESI requests, and interrogatories, seeking documents and information not called for by the Discovery Protocols, on or before July 11, 2025.
5. Plaintiff shall produce authorizations for the release of medical and mental health records on or before July 11, 2025.

**C. Electronically Stored Information: issues about disclosure or discovery, including the forms in which it should be produced:**

The parties agree Electronically Stored Information will be exchanged in discovery. The parties will negotiate regarding custodians, search terms, and form of production.

**D. Privilege, or protection as trial-preparation materials, and whether to include agreement in an order:**

The parties agree that all communications between their respective law firms and their clients are covered by the attorney-client privilege and need not be included in a privilege log.

**E. Discovery limitations: any changes to rules or other limitations sought:**

The parties will submit a proposed Protective Order to the Court for review.

Dated: June 16, 2025


JACKSON LEWIS P.C.

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**SO ORDERED:**

  
U.S.D.J.

6/17/25